

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION

UMG RECORDINGS, INC.,  
CAPITOL RECORDS, LLC,  
UNIVERSAL MUSIC CORP.,  
POLYGRAM PUBLISHING, INC,  
SONGS OF UNIVERSAL, INC.,  
UNIVERSAL MUSIC – MGB NA LLC,  
and UNIVERSAL MUSIC – Z TUNES LLC,

*Plaintiffs,*

v.

BRINKER INTERNATIONAL, INC.,  
BRINKER INTERNATIONAL PAYROLL  
COMPANY, L.P.,  
and DOES 1 THROUGH 10,

*Defendants.*

Civil Action No.: 3:24cv2535-K

JURY TRIAL DEMANDED

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**JOINT MOTION TO STAY**

The Parties respectfully submit this Joint Motion to Stay and would respectfully show the Court as follows:

1. The Parties attended a mediation with The Honorable Suzanne H. Segal (Ret.) on May 7, 2025.
2. With the mediator's assistance, the Parties have reached an agreement in principle to settle the case.
3. The Parties are currently finalizing the settlement agreement and expect to file a joint dismissal by July 7, 2025.
4. Defendants' current deadline to respond to the Complaint is May 21, 2025. [Doc. No. 28].
5. In the unlikely event that the Parties are unable to agree to the terms necessary to execute a binding settlement agreement and perform any necessary obligations that would allow the Parties

to file a joint dismissal by July 7, 2025, the Parties will so inform the Court and Defendants will file their responsive pleading on July 7, 2025.

For the foregoing reasons, the Parties respectfully request that the Court grant this Motion and stay the Action until July 7, 2025.

Respectfully submitted,

/s/ Cathryn A. Berryman (with permission)

Cathryn A. Berryman  
State Bar No. 02252990  
Michael D. Karson  
State Bar No. 24090198  
WINSTEAD PC  
2728 N. Harwood Street  
Suite 500  
Dallas, Texas 75201  
Tel.: 214.745.5400  
Fax: 214.745.5390  
Email: [cberryman@winstead.com](mailto:cberryman@winstead.com)  
[mkarson@winstead.com](mailto:mkarson@winstead.com)

COUNSEL FOR PLAINTIFFS  
UMG RECORDINGS, INC.; CAPITOL  
RECORDS, INC.; UNIVERSAL MUSIC  
CORP.; POLYGRAM PUBLISHING, INC.;  
SONGS OF UNIVERSAL, INC.,  
UNIVERSAL MUSIC – MGB NA LLC;  
AND UNIVERSAL MUSIC – Z TUNES  
LLC

Respectfully submitted,

/s/ Maura Rees

Maura Rees (Pro Hac Vice)  
Email: [MRees@wsgr.com](mailto:MRees@wsgr.com)  
WILSON SONSINI GOODRICH & ROSATI  
650 Page Mill Road  
Palo Alto, CA 94304-1050  
Telephone: (650) 493-9300  
Facsimile: (866) 974-7329

Gary R. Greenstein (Pro Hac Vice)

Email: [ggreenstein@wsgr.com](mailto:ggreenstein@wsgr.com)  
WILSON SONSINI GOODRICH & ROSATI  
1700 K Street, NW Fifth Floor  
Washington, D.C. 20006-3817  
Telephone: (202) 973-8849  
Facsimile: (202) 973-8899

and

/s/ Megan M. O'Laughlin

Megan M. O'Laughlin (TX24013263)  
E-Mail: [molaughlin@hitchcockevert.com](mailto:molaughlin@hitchcockevert.com)  
HITCHCOCK EVERETT LLP  
750 North St. Paul Street, Suite 1110  
Dallas, TX 75201  
Telephone: (214) 953-1111  
Facsimile: (214) 953-1121

COUNSEL FOR DEFENDANTS  
BRINKER INTERNATIONAL, INC. AND  
BRINKER INTERNATIONAL PAYROLL  
COMPANY, L.P.

**CERTIFICATE OF SERVICE**

On May 21, 2025, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Megan M. O'Laughlin  
Megan M. O'Laughlin